

**NATIONAL CENTER ON
SEXUAL EXPLOITATION**

Benjamin W. Bull*
Peter A. Gentala*
Danielle Bianculli Pinter*
Christen M. Price*
1201 F ST NW, Suite 200
Washington, D.C., 20004
Telephone: (202) 393-7245
lawcenter@ncose.com

THE HABA LAW FIRM, P.A.

Lisa D. Haba*
Adam A. Haba*
1220 Commerce Park Dr., Suite 207
Longwood, FL 32779
Telephone: (844) 422-2529
lisahaba@habalaw.com
adamhaba@habalaw.com

THE MATIASIC FIRM, P.C.

Paul A. Matiasic (SBN 226448)
Hannah E. Mohr (SBN 294193)
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 675-1089
matiasic@mjlawoffice.com

**Pro Hac Vice Application Pending*

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE, A MINOR CHILD, BY AND
THROUGH HIS NEXT FRIEND JANE
DOE,

Plaintiff,

vs.

TWITTER, INC.,

Defendant.

Case No.: 3:21-cv-00485

**EX PARTE MOTION FOR APPOINTMENT
OF GUARDIAN AD LITEM;
DECLARATION OF JANE DOE IN
SUPPORT OF MOTION; ~~PROPOSED~~
ORDER APPOINTING GUARDIAN AD
LITEM**

Applicant Jane Doe (true initials B.M.) is the mother of Plaintiff John Doe. John Doe is a 17-year-old minor who has eleven causes of action in the above-captioned matter. Jane Doe is qualified and competent to act in John Doe's best interests, as she has for John Doe's entire life. She is qualified to understand and protect the rights of the person she will represent and has no interest adverse to the interests of her minor child. Her Declaration is attached to this Motion.

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**EX PARTE MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM; DECLARATION
OF JANE DOE IN SUPPORT OF MOTION; [PROPOSED] ORDER APPOINTING
GUARDIAN AD LITEM**

1 Therefore, Plaintiff hereby moves this Court for an order appointing Jane Doe (true
2 initials B.M.) as guardian ad litem of John Doe for the purpose of bringing this lawsuit against
3 Defendant on the claims stated above.
4

5
6 Respectfully submitted,

7
8 Dated: January 20, 2021

By: /s/ Paul A. Matiasic
Paul A. Matiasic
Hannah E. Mohr
THE MATIASIC FIRM, P.C.
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 675-1089
matiasic@mjlawoffice.com

Lisa D. Haba*
Adam A. Haba*
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Longwood, FL 32779
Telephone: (844) 422-2529
lisahaba@habalaw.com
adamhaba@habalaw.com

Benjamin W. Bull*
Peter A. Gentala*
Dani Bianculli Pinter*
Christen M. Price*
**NATIONAL CENTER ON SEXUAL
EXPLOITATION**
440 First Street, NW, Suite 840
Washington, D.C. 20001
Telephone: (352) 266-7989
lawcenter@ncose.com

Attorneys for Plaintiff

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DECLARATION OF JANE DOE

I, JANE DOE, do declare as follows:

1. I am over the age of 18 and swear, under penalty of perjury, that the following is true of my own personal knowledge.

2. John Doe is a minor of the age of 17 years.

3. John Doe is commencing this lawsuit against Defendant Twitter, Inc. for various violations stemming from child sex trafficking, including but not limited to, violation of The Trafficking Victims Protection Act, 18 U.S.C. § 1591(a), violation of the Duty to Report Child Sexual Abuse Material, 18 U.S.C. § 2258A, Receipt and Distribution of Child Pornography, 18 U.S.C. § 2252A, and for damages and fees recoverable under each.

4. I am the mother of John Doe and no previous petition for guardian ad litem has been filed in this matter.

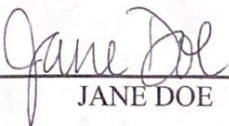
5. I am a competent and responsible person and fully capable and qualified to act as John Doe's guardian ad litem.

6. My home residence is in Florida.

7. I am ready, willing, and able to act as guardian ad litem to John Doe.

8. If the Motion is granted, I consent to act as guardian ad litem for the minor, John Doe, in the above action.

Executed this 20 day of January, 2021 in the State of Florida.

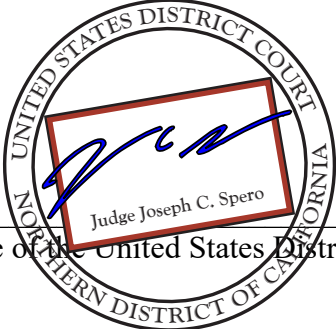

JANE DOE

~~PROPOSED~~ ORDER

THE COURT FINDS that it is reasonable and necessary to appoint a Guardian ad Litem for the minor child, John Doe, appointed as requested.

THE COURT ORDERS that Jane Doe (true initials B.M.) is hereby appointed as the Guardian ad Litem for minor child, John Doe.

Dated: January 21, 2021


Judge of the United States District Court

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email address denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of January, 2021.

/s/ Hannah E. Mohr
Paul A. Matiasic
Hannah E. Mohr
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San Francisco, CA 94111
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